

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

CAROLYN RAFAELIAN, an individual, ALEX AND
ANI PLEDGE CO., a Rhode Island Corporation, and
VENICE BEACH WALK, LLC, a California Limited
Liability Company,

Plaintiffs,

- v -

LC A&A HOLDINGS, INC., a Delaware Corporation,
LC A&A INTERMEDIATE INVESTORS, LLC, a
Delaware Limited Liability Company, LYNDON LEA,
an individual, A AND A SHAREHOLDING CO., LLC,
a Delaware Limited Liability Company, and ROBERT
TRABUCCO, an individual,

Defendants.

1:20-cv-00247-MSM-PAS

**DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT**

Defendants, LC A&A Holdings, Inc., LC A&A Intermediate Investors, LLC, Lyndon Lea, A and A Shareholding Co, LLC and Robert Trabucco, by and through their undersigned attorneys, hereby submit this Motion to Dismiss Plaintiffs' Amended Complaint pursuant to Rules 12(b)(2), (3) and (6) of the Federal Rules of Civil Procedure. In support of their motion, Defendants rely on the points and authorities set forth in the accompanying memorandum of law.

Dated: August 14, 2020

Respectfully submitted,

/s/ Matthew T. Oliverio

Matthew T. Oliverio (#3372)
OLIVERIO & MARCACCIO LLP
55 Dorrance Street, Suite 400
Providence, RI 02903
(401) 861-2900
(401) 861-2922 Fax
mto@om-rilaw.com

Elizabeth M. Sacksteder (*Admitted pro hac vice*)
Michelle K. Parikh (*Admitted pro hac vice*)
Alyson A. Cohen (*Admitted pro hac vice*)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, New York 10019-6064
Tel.: (212) 373-3000
Fax: (212) 492-0020

*Counsel for Defendants LC A&A Holdings, Inc.,
LC A&A Intermediate Investors, LLC, and Lyndon Lea*

David I. Horowitz (*Admitted pro hac vice*)
KIRKLAND & ELLIS, LLP
555 South Flower Street, 37th Floor
Los Angeles, CA 90071
Tel.: (213) 680-8374
Fax: (213) 808-8074

Andre S. Digou (#8711)
CHACE, RUTTENBERG & FREEDMAN, LLP
One Park Row, Suite 300
Providence, RI 02903
Tel.: (401) 453-6400
Fax: (401) 453-6411
adigou@crflp.com

*Counsel for Defendants A & A Shareholding Co., LLC
and Robert Trabucco*

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2020, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Matthew T. Oliverio